

REMARKS

Reconsideration of the present application is respectfully requested in view of the following comments.

1. In the Specification

In the Office Action, the specification has been objected to on basis of informalities. As requested, the specification has been amended to include section headings at appropriate locations throughout the specification, and specific reference within the specification to the claims 1 and 14 has been removed. Moreover, minor changes were made to the specification to improve the language therein. It is submitted that the minor changes do not add new matter to the specification.

In view of the amendment to the specification, Applicants respectfully request approval of the specification and removal of the objections.

2. Rejection of claims 1-17 under 35 U.S.C. § 112, second paragraph

Presently, claims 1-17 stand rejected for failing to particularly point and distinctly claim the subject matter of the invention. Specific language in the claims requiring correction by the Examiner is provided in the outstanding Office Action, and such language has been changed in the "Amendments to the Claims" as presented above.

Specifically, claims 1, 2, 5, 9, 14, 15 and 17 have been amended to overcome this rejection and to improve the clarity of the subject matter for which protection is sought. Applicants submit that the changes to the claims are related to informalities and self-evident, and accordingly, a detailed account of each amendment to the claims is not necessary. Applicants assert that the amendments to claims 1, 2, 5, 9, 14, 15 and 17 do not narrow the scope of the subject matter recited therein, nor do they present issues requiring additional searching of the prior art.

Claim 10 has been canceled in its entirety without prejudice or disclaimer.

Applicants submit that the amendments to the claims place the claims in compliance with 35 U.S.C. § 112, second paragraph. Accordingly, withdrawal of the rejection is requested.

3. Rejection of claim 14 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 2,923,587 (Zipf)

Claim 14 currently stands rejected as being anticipated on the basis that the disclosure of Zipf describes the basic method of depositing loose sheet material of the present invention. As amended, claim 14 of the present application presently recites that the method of the invention includes the step of selectively depositing sheet material in loose and strapped form in a deposit bin of a deposit unit of an apparatus for depositing loose sheet material.

As pointed out in the Office Action, the Examiner has acknowledged that Zipf fails to disclose the use of a strapping machine to wrap sheet material. Upon a careful review of the disclosure of Zipf, Applicants readily agree with the Examiner's acknowledgment. Therefore, it is quite clear that there is no disclosure or suggestion of a strapping machine in the disclosure of Zipf, and thus, the disclosure of Zipf cannot possibly be construed to disclose a step of depositing strapped sheet material.

Accordingly, the disclosure of Zipf fails to disclose or suggest each and every step or feature of claim 14 of the present application, and hence, the method of claim 14 is not anticipated by the disclosure of Zipf. Withdrawal of this rejection is respectfully requested.

4. Rejection of claims 1-4, 9, 10, 12 and 13 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 2,923,587 (Zipf) in view of U.S. Patent 5,996,314 (Pennini et al.)

Claims 1-4, 9, 10, 12 and 13 of the present application currently stand rejected as being obvious in view of the disclosures of Zipf and Pennini et al. Applicants respectfully traverse this rejection on the basis that the disclosures of Zipf and Pennini et al., whether considered individually or collectively, fail to disclose or suggest the apparatus of claim 1. Accordingly, claim 1 is patentable. Claims 2-4, 9, 12 and 13, which depend directly or indirectly from claim 1, are thus patentable based on their dependency from claim 1 and their individually recited features.

Claim 1 of the present application recites an apparatus for depositing loose sheet material such as papers of value and bank notes. The apparatus includes a transport apparatus arranged to transport sheet material, and a stacking unit for depositing the sheet material into a deposit device as well as a strapping unit. The deposit device is characterized in that it is arranged for selective deposition of loose and strapped sheet material.

As acknowledged by the Examiner in the Office Action and maintained by Applicants, the disclosure of Zipf fails to disclose or suggest a strapping machine and the use thereof to strap sheets of material.

The disclosure of Pennini et al. has been provided in the Office Action as exemplifying known teachings of strapping sheet material. Pennini et al. describe a method and apparatus for automatically feeding, inspecting, authenticating, sorting, counting and stacking currency documents, and then binding the documents into document bundles with strapping tape (col. 1, lines 36-40). Contrary to the apparatus recited in claim 1 of the present application, there is no disclosure or suggestion in the teachings of Pennini et al. that suggest a deposit device that is arranged for selective deposition of loose and strapped sheet material.

It will be pointed out that it is an objective of the present invention to provide a deposit device that optionally deposits loose and strapped sheet material (written description page 1, last full paragraph). Claim 1 includes this inventive feature by reciting that the deposit device selectively deposits loose and strapped sheet

material. Applicants submit that the cited references used in this rejection fail to teach or suggest this critical feature of the present invention.

While the system of Zipf may be capable of being modified to include a deposit device that selectively deposits loose and strapped sheet, there must be some suggestion or motivation in the references to do so. Applicants submit that the disclosure of Pennini et al. fails to provide any suggestion to include such a deposit device that operates as the one recited in claim 1 of the present application with such optional features.

As it is well understood, statements that modifications of cited art would have been well within the ordinary skill in the art at the time the claimed invention was made because all references relied upon teach that all aspects of the claimed invention were known in the art is not sufficient to establish prima facie obviousness without some objective reason to combine the teachings of the references. Applicants submit that there are no objective reasons provided in the teachings of Zipf and Pennini et al. that would tend to suggest the desirability of providing a deposit device that selectively deposits loose and strapped sheet material.

Accordingly, in view of these observations, Applicants courteously submit that the present invention would not be obvious in view of the disclosures of Zipf and Pennini et al. Withdrawal of this rejection is respectfully requested.

5. Rejection of claims 5-8 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 2,923,587 (Zipf) in view of U.S. Patent 5,996,314 (Pennini et al.) and further in view of U.S. Patent 4,369,360 (Tsuji)

Claims 5-8 presently stand rejected as being obvious in view of the disclosures of Zipf, Pennini et al. and Tsuji. Applicants respectfully traverse this rejection on the basis that the teachings of Zipf, Pennini et al. and Tsuji, whether considered collectively or individually, fail to disclose or suggest the apparatus of

claim 1 of the present application. Claims 5-8, which depend directly or indirectly from claim 1, are thus patentable based on their dependency from claim 1 and their individually recited features.

As discussed above, the disclosures of Zipf and Pennini et al. fail to disclose or suggest deposit device recited in claim 1. The disclosure of Tsuji fails to make up for the deficiencies in the teachings of Zipf and Pennini et al. More specifically, Tsuji fails to disclose or suggest a deposit device that is arranged for selective deposition of loose and strapped sheet material, as described above.

Accordingly, in view of these observations, Applicants respectfully submit that the present invention would not be obvious in view of the disclosures to Zipf, Pennini et al. and Tsuji. Withdrawal of this rejection is respectfully requested.

6. Rejection of claim 17 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 2,923,587 (Zipf) in view of U.S. Patent 4,369,360 (Tsuji)

Claim 17 presently stands rejected as being obvious in view of the disclosures of Zipf and Tsuji. Applicants respectfully traverse this rejection on the basis that the disclosures of Zipf and Tsuji fail to disclose or suggest, whether considered collectively or individually, the basic claimed method of claim 14 of the present application.

The patentability of claim 14 in view of the disclosure of Zipf is discussed above. Applicants submit that the disclosure of Tsuji fails to make up for the deficiencies of the disclosure of Zipf. More specifically, Tsuji fails to disclose or suggest a method for depositing loose sheet material including the step of selectively depositing sheet material in loose and strapped form in a deposit bin of a deposit unit of an apparatus for depositing loose sheet material.

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Examiner: Paul R. DURAND
Group Art Unit: 3721

Accordingly, in view of these observations, Applicants respectfully submit that the present invention would not be obvious in view of the disclosures to Zipf and Tsuji. Withdrawal of this rejection is respectfully requested.

7. Conclusion

In view of the amendment to the claims, and further in view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is respectfully requested that claims 1-9 and 11-17 be allowed and the application be passed to issue.

If any issues remain that may be resolved by a telephone or facsimile communication with the Applicants' Attorney, the Examiner is invited to contact the undersigned at the numbers shown below.

BACON & THOMAS, PLLC
625 Slaters Lane, Fourth Floor
Alexandria, Virginia 22314-1176
Phone: (703) 683-0500

Date: December 22, 2003

amendment 261203.wpd

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Justin J. Cassell", written in a cursive style.

JUSTIN J. CASSELL
Attorney for Applicants
Registration No. 46,205